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VIA FACSIMILE

July 3, 2007

Hon. Naomi R. Buchwald
United States District Judge
500 Pearl St., Room 2270
New York, NY 10007

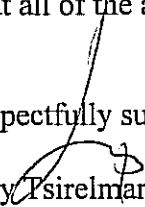
Re: Hochberg v. WZO, Case # 07-CV-3470
REPLY TO DEFENDANT'S LETTER

Dear Judge:

The Plaintiff has a good faith basis to believe that the two individuals mentioned are flying out of the country very soon (before August) and will not return. Nonetheless, if the Defendant is representing to the Court that the two individuals are flying out between "August 15th and 30th", then Plaintiff respectfully requests that the Court order their depositions before August 15th, 2007 (the earliest date of their departure). Plaintiff will make every arrangement possible to facilitate these depositions. We are willing to take the depositions of these witnesses even on the weekend.

Finally, the undersigned is constrained to respond to Ms. Rosenfeld baseless allegations of "*ex parte* conversations". Your Honor's rules allow *ex parte* contact in case of emergency. Ms. Paskalova contacted the chambers to find out if this request must be done via a motion or it can be done in a form of a letter. Because the Plaintiff was and still is under the belief that the two witnesses are about to flee the Country the phone call was made to the chambers on an emergency basis. Although Ms. Rosenfeld is quick to lecture on the prohibition of *ex parte* communications, she mysteriously forgot about the rule when "Ms. Choi, Your Honor's Clerk, [called]" her to tell her that Ms. Paskalova called. As for her suggestion that this office call and ask her for any information, I think it is clear by now that all of the associates of this firm have lost their trust in a person like Ms. Rosenfeld.

Respectfully submitted,


Gary Tsirelman (GT3489)

CC: Shira Y. Rosenfeld, SHIBOLETH, YISRAELI, ROBERTS & ZISMAN, LLP
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